

**Ernest Warren, Jr. OSB 891384**  
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**Attorney for Defendant Eric Lee Flores**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:16-CR-00051-25-BR**

**Plaintiff,**

**v.**

**DECLARATION OF  
ERNEST WARREN, JR.  
AMENDED MOTION  
FOR A CONTINUANCE  
OF TRIAL DATE**

**ERIC LEE FLORES,**

**Defendant.**

I, Ernest Warren, Jr., do depose and say:

1. I was appointed to represent defendant Eric Lee Flores on March 17, 2016, by the Honorable Anna Brown.
2. This is defendant's first amended request to continue the trial date.
3. The parties have discussed the fact that there are thousands of pages of discovery as well as videos and images. Defense Counsel needs time to review discovery, follow investigation leads, prepare and file motions, and advise the defendant on legal matters
4. Assistant United States Attorney Craig Gabriel does object to this request.
5. I, therefore, would request the Court to grant Motion for a Continuance of Trial until after December 6, 2016 due to a conflict in scheduling with the trial for **State v. Lawson 15-CR-26804**. Mr. Lawson was arraigned in June 2015.
6. Also, Mr. Flores does not object to this request.

**PAGE 2—DECLARATION IN SUPPORT OF AMENDED MOTION FOR A  
CONTINUANCE OF TRIAL**

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Attorneys at Law  
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DATED this 5<sup>th</sup> day of May, 2016.

RESPECTFULLY SUBMITTED,

/s/ Ernest Warren, Jr.

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**Ernest Warren, Jr. OSB No. 891384**  
Attorney for defendant

**PAGE 2—DECLARATION IN SUPPORT OF AMENDED MOTION FOR A  
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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a certified true copy of the **AMENDED MOTION TO CONTINUE TRIAL DATE AND DECLARATION IN SUPPORT OF AMENDED MOTION TO CONTINUE TRIAL DATE** in the attached matter upon the parties listed below by notice of electronic filing using the CM/ECF System as follows:

**Ethan D. Knight**  
**Craig J. Gabriel**  
**Geoffrey A. Barrow**  
U.S. Attorney's Office  
District of Oregon  
1000 S.W. Third Avenue  
Suite 600  
Portland, OR 97204  
503-727-1118  
Fax: 503-727-1117

and filed the original with the Court on the date listed below.

DATED this 5<sup>th</sup> day of May, 2016.

**WARREN & SUGARMAN**

/s/Ernest Warren, Jr.  
**Ernest Warren, Jr. OSB No. 891384**  
Attorney for Defendant